

1 TREVOR J. HATFIELD, ESQ  
2 Nevada Bar No. 7373  
3 HATFIELD & ASSOCIATES, LTD.  
4 703 S. Eighth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 388-4469  
7 Facsimile: (702) 386-9825  
8 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
9 Attorney for Plaintiff In conjunction with Legal Aid  
10 Center of Southern Nevada Pro Bono Project

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 JUSTIN L. TRIPP,  
14 Plaintiff,  
15 vs.  
16 CLARK COUNTY, et al  
17 Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

18 **STIPULATION AND ORDER TO**  
19 **EXTEND TIME FOR PLAINTIFF TO**  
20 **RESPOND TO DEFENDANTS'**  
21 **MOTIONS FOR SUMMARY**  
22 **JUDGMENT**  
23 **(Third Request)**

24 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law  
25 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza,  
26 Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacquelyn  
27 Schumaker and Defendants LVMPD Sergeants' (hereinafter "LVMPD Defendants") by and  
28 through their counsel, the law firm of Kaempfer Crowell, and Defendant NaphCare, Inc.,  
Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich,  
Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare  
Defendants"), by and through their counsel, the law firm of Lauria Tokunaga Gates & Linn,  
LLP, hereby stipulate and agree to extend the time for Plaintiff to Respond to the following  
Defendants' Motions for Summary Judgment, due on October 14, 2021, to December 13, 2021:

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703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469

1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];
2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment [ECF #199];
3. Defendants Michael Rose's and Jacquelyn Schumaker's Motion for Summary Judgment [ECF #200];
4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].
5. NaphCare Defendants' Motion for Summary Judgment [ECF #197].

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' third request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary Judgment.

Good cause exists for this extension. Plaintiff's counsel is requesting a sixty (60) day extension of time up to and including December 13, 2021, to respond to all parties' Motions for Summary Judgment as Plaintiff is in prison, communication must be scheduled, and the volume of the motions. Plaintiff informed his counsel in July 2021 that he was being transferred to another Federal Prison but did not know when he would arrive and where he would be residing at that time. Plaintiff has been transported to several Federal Prison's since July 2021, each time having to deal with a twenty-one (21) day quarantine, but as of today, we have not been able to ascertain if he has arrived at his final destination.

In addition, Plaintiff was not permitted to take his legal documents with him in transit. Therefore, Plaintiff's counsel shall have to forward all of the legal documents to his new prison location once known. Defendants have courteously granted this extension of time for Plaintiff to file his Responses. Accordingly, Plaintiff shall have up to and including December 13, 2021, to

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1 respond to Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200],  
2 [ECF #201] and [ECF #197].  
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4 DATED this 8<sup>th</sup> day of October, 2021

DATED this 8<sup>th</sup> day of October, 2021

5 **HATFIELD & ASSOCIATES**

**KAEMPFER CROWELL**

6 */s/ Trevor J. Hatfield*  
7 By: TREVOR J. HATFIELD, ESQ. (SBN 7373)  
8 703 S. Eighth Street  
9 Las Vegas, Nevada 89101  
10 Tel: (702) 388-4469  
11 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
12 *Attorney for Plaintiff In Conjunction with*  
13 *Legal Aid Center of Southern Nevada Pro*  
14 *Bono Project.*

*/s/ Lyssa S. Anderson*  
By: LYSSA S. ANDERSON, ESQ. (SBN 5781)  
RYAN W. DANIELS, ESQ. (SBN 13094)  
1980 Festival Plaza Drive, Ste. 650  
Las Vegas, Nevada 89135  
Tel: (702) 792-7000  
Email: [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
Email: [rdaniels@kcnvlaw.com](mailto:rdaniels@kcnvlaw.com)  
*Attorneys for Defendants Cesar Esparza,*  
*Michael Rose, Jacquelyn Schumaker, LVMPD*  
*Sergeants'.*

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1 DATED this 8<sup>th</sup> day of October, 2021.

2 **LAURIA TOKUNAGA GATES & LINN, LLP**

3 /s/ Paul A. Cardinale

4 By: \_\_\_\_\_  
5 PAUL A. CARDINALE, ESQ. (SBN 8394)  
6 1755 Creekside Oaks Drive, Suite 240  
7 Sacramento, CA 95833  
8 Tel.: (916) 492-2000  
9 Email: [pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)

10 **Southern Nevada Office:**

11 601 South Seventh Street  
12 Las Vegas, NV 89101  
13 Tel.: (702) 387-8633

14 *Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his*  
15 *individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH*  
16 *(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as*  
17 *SCHULTZ") in her individual capacity, and RAYMOND MONDORA*

18 **ORDER**

19 **IT IS SO ORDERED:**

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21 \_\_\_\_\_  
22 UNITED STATES DISTRICT COURT JUDGE

23 Dated: October 12, 2021